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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

19 PROCTOR HILL RD.  
HOLLIS 603/465-2422  
NASHUA 603/889-7905  
FAX: 603/465-3320

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**BELTRONICS, INC.**

P.O. BOX 330  
HOLLIS, N.H. 03049

RALPH HALLER  
CHIEF, PRIVATE RADIO BUREAU

BEFORE THE  
FEDERAL COMMUNICATIONS  
COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of)

Replacement of Part 90 by Part 88 to )  
Revise the Private Land Mobile Radio )  
Services and Modify the Governing Policies)

R Docket No. 92-234<sup>35</sup>

COMMENTS OF JAMES P. BELANGER

on Behalf of the Town of Hollis, N.H. as one of its elected Board of Selectmen, and  
on Behalf of Beltronics, Inc., a New Hampshire Corporation engaged in the two-way  
radio industry for over 25 years.

The proposes Part 88 "refarming" is probably well intended on the part of the Commission however,  
is most assuredly motivated by private interests of major equipment suppliers.

The successful implementation of this plan will necessitate, in a time when the opposite is most  
certainly called for, the replacement of equipment by municipalities and small business owners who are  
already strapped from government intervention at the Federal Level.

Implementing and promoting TRUNKING at 150 to 512 MHZ would allow use of present equipment and  
allow for expanded use of existing frequency spectrum. This technology has made efficient use of  
frequencies above 800 MHZ and should allow for the same efficiency at 150 to 512 MHZ.

I urge the Commission and my elected representatives to examine this silent giant which is about  
to make changes beyond the common person's ability to grasp and which will benefit only those who are  
giants in the industry. If this were a true benefit to the majority of the users of this spectrum, I  
would support it. As I view it, it will cause 60 to 70 percent of my existing struggling customers to  
discontinue the use of radios as a tool in their business and it will cause communities, like our town, to  
expend tax dollars to replace radio equipment for continued protection of life and property.

This proposed change is premature and its implementation schedule is too aggressive especially in  
light of the fact that there are unexplored alternatives. This comes as a result of the FCC's inability  
to control overcrowding due to their refusal to limit new users to existing facilities. When vehicular  
traffic builds we insist they use the existing roads and **RECEIVED** this proposal would  
eliminate all the vehicles and redefine the roads.

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*James Belanger*

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